Case 5:13-cr-00057-EJD Document 15 Filed 04/11/13 Page 1 of 4 1 STEVEN G. KALAR IT IS SO ORDERED Federal Public Defender 2 ROBERT M. CARLIN AS MODIFIED Assistant Federal Public Defender 3 160 West Santa Clara Street, Suite 575 San Jose, CA 95113 Telephone: (408) 291-7753 4 E-mail: westcliff3@gmail.com 5 Counsel for Defendant 6 JOSE MONDRAGON-SANCHEZ 4/11/2013 7 8 IN THE UNITED STATES DISTRICT COURT 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA 10 SAN JOSE DIVISION 11 UNITED STATES OF AMERICA, No. CR 13-00057-EJD 12 Plaintiff, STIPULATION TO CONTINUE STATUS 13 CONFERENCE; [PROPOSED] ORDER VS. 14 JOSE MONDRAGON-SANCHEZ, 15 Defendant. 16 Plaintiff United States of America, by and through Special Assistant United States 17 18 Attorney Meredith Edwards, and Defendant JOSE MONDRAGON-SANCHEZ ("Mr. 19 Mondragon"), by and through his attorney of record, Assistant Federal Public Defender Robert 20 Carlin, hereby stipulate that the status conference in this case should be continued from April 15 21 to May 6, 2013, at 1:30 p.m. 22 1. Mr. Mondragon has been charged in a single count Information, which was filed on 23 January 28, 2013, with a violation of 8 U.S.C. § 1326. 24 2. A status conference before this Honorable Court is scheduled for April 15, 2013, at 25 1:30 p.m. 26 STIPULATION TO CONTINUE STATUS CONFERENCE; [PROPOSED] ORDER 1 CASE NO. CR 13-00057

Case 5:13-cr-00057-EJD Document 15 Filed 04/11/13 Page 2 of 4 1 3. Counsel and Mr. Mondragon need additional time to review the discovery provided by 2 the government. Also, there is a legal issue that needs further research and discussion which 3 could significantly affect the disposition of Mr. Mondragon's case. 4 4. Mr. Mondragon respectfully requests that the status hearing be continued as requested, 5 and agrees to the exclusion of time from April 15 to May 6, 2013, pursuant to 18 U.S.C. § 3161 6 (h)(7)(A). 7 5. Accordingly, the parties request that the status hearing be continued to May 6, 2013, 8 at 1:30 p.m. 9 IT IS SO STIPULATED. 10 Respectfully submitted, 11 STEVEN G. KALAR Federal Public Defender 12 13 /S/ROBERT M. CARLIN 14 Dated: April 11, 2013 Assistant Federal Public Defender 15 UNITED STATES ATTORNEY 16 17 /S/Dated: April 11, 2013 18 MEREDITH EDWARDS 19 Special Assistant United States Attorney 20 21 22 23 24 25 26 STIPULATION TO CONTINUE STATUS

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7	
8	IN THE UNITED STATES DISTRICT COURT
9	FOR THE NORTHERN DISTRICT OF CALIFORNIA
10	SAN JOSE DIVISION
11)
12	UNITED STATES OF AMERICA,) No. CR 13-00057-EJD
13	Plaintiff,) YPXXXXXXXX ORDER ON STIPULATION) TO CONTINUE STATUS CONFERENCE
14	vs.
15	JOSE MONDRAGON-SANCHEZ,
16	Defendant.)
17	(*************************************
18	1. Mr. Mondragon has been charged in a single count Information, which was filed on
19	January 28, 2013, with a violation of 8 U.S.C. § 1326.
20	2. A status conference before this Honorable Court is scheduled for April 15, 2013, at
21	1:30 p.m.
22	3. Counsel and Mr. Mondragon need additional time to review the discovery provided by
23	the government. Also, there is a legal issue that needs further research and discussion which
24	could significantly affect the disposition of Mr. Mondragon's case.
25	4. There is good cause for the requested continuance, and the "ends of justice" served by
26	taking such action "outweigh the best interest of the public and the defendant in a speedy trial." STIPULATION TO CONTINUE STATUS CONFERENCE; [PROPOSED] ORDER CASE NO. CR 13-00057 3

18 U.S.C. § 3161 (h)(7)(A). Accordingly, the time from April 15 to May 6, 2013, is excluded pursuant to section § 3161 (h)(7)(A). 5. The status hearing in this matter shall be continued to May 6, 2013, at 1:30 p.m. IT IS SO ORDERED. 4/11/2013 Dated: United States District Judge

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